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April 9, 1992

Federal Communications Commission
Office of the Secretary

HAND DELIVER

Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

RE: Amendment to Application of Central Florida Educational
Foundation, Inc., for Channel 202C3, Union Park, Florida,
(BPED-881207MA): MM Docket No. 92-33

Dear Ms. Searcy:

Transmitted herewith in triplicate on behalf of Central Florida
Educational Foundation, Inc., is an amendment to the
above-referenced application, pending in the docketed proceeding.

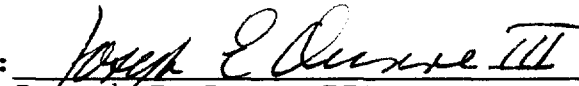
Submission of the attached amendment is required by paragraph 7
of the Hearing Designation Order in MM Docket No. 92-33, so no
petition for leave to amend the application is submitted. As
shown by the attached certification of service, all parties to
the proceeding, the designated Presiding Officer and the Chief,
Audio Services Division, have been served with a copy of this
amendment.

Should any questions arise concerning this matter, kindly contact
the undersigned directly.

Respectfully submitted,

MAY & DUNNE, CHARTERED

By:


Joseph E. Dunne III
Attorney for Central Florida
Educational Foundation, Inc.

JED:jrfA41

xc: CFEF Public File

All Per Attached Certification of Service

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CFEFI

CENTRAL FLORIDA EDUCATIONAL FOUNDATION, INC.

400 West Lake Brantley Road
Altamonte Springs, Florida 32714-2715
Phone: (407) 682-9494 • FAX: (407) 682-7005

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Federal Communications Commission
Office of the Secretary

April 8, 1992

Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

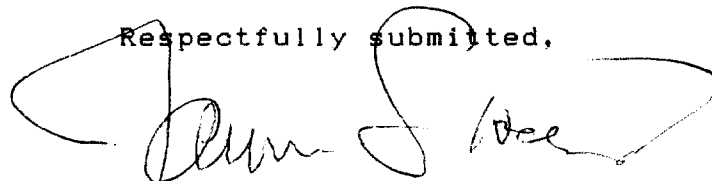
RE: Application of Central Florida Educational
Foundation, Inc., for Channel 202C3,
Union Park, Florida (BPED-881207MA)

Dear Ms. Searcy:

Please amend Central Florida Educational Foundation, Inc.'s (CFEF) above-referenced application to note that the application is not subject to "environmental processing" under section 1.1307 of the Commission's rules. The facilities specified in CFEF's application: are not located in an officially designated wildlife area or preserve; do not affect listed threatened or endangered species or designated critical habitats; do not affect districts, sites, buildings, structures or objects which are significant in American History, architecture, archaeology, engineering or culture, or which are listed in the National Register of Historic Places; affect Indian religious sites; involve significant change in surface features; or, which involve a structure with high intensity white lights which are located in a neighborhood.

Finally, as shown by the attached Engineering Statement, the addition of CFEF's antenna on the existing WCPX-TV tower will not result in a cumulative power density of RF radiation at the tower base in excess of the *Radio Frequency Protection Guides* recommended in the *American National Standard Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 300 kHz to 100 GHz* (ANSI C95.1-1982), issued by the American National Standards Institute.

Respectfully submitted,



James S. Hoge, President
Central Florida Educational
Foundation, Inc.

CFEFI

CENTRAL FLORIDA EDUCATIONAL FOUNDATION, INC.

400 West Lake Brantley Road

Altamonte Springs, Florida 32714-2715

Phone: (407) 682-9494 • FAX: (407) 682-7005

ENGINEERING STATEMENT EVALUATION OF POSSIBLE HUMAN RF EXPOSURE RESULTING FROM PROPOSED Ch202C3 AT UNION PARK, FLORIDA

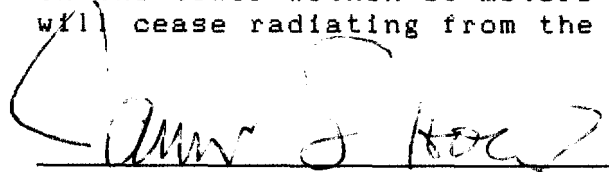
The following is in response to the Commission's Hearing Designation Order released March 10, 1992, requesting additional information on the potential for human RF exposure which would be produced by the Application of Central Florida Educational Foundation, Inc., (BPED-881207MA), herein known as CFEFI.

CFEFI proposes to operate with 950 watts ERP with horizontal polarization only and employing a 6 bay antenna. (See Exhibit B of the July 1990 Form 340 Application.) Referring to TABLE 1 of OST Bulletin 65, and rounding the power upward to the next tabulated value, (3 kilowatts), one finds that the "worst case" distance for this situation is 10 meters. CFEFI proposes to operate with a center of radiation 438 meters above ground, or 43.8 times the "worst case" distance.

By inverse ratio, the electrical field at ground level will be $1/43.8$ or 2.283% of the field at the worst case distance. Because power decreases as the square of voltage, the worst case power density at ground level caused by the proposed Channel 202 facility would be 0.052% of the ANSI maximum.

As shown in Exhibit H of CFEFI's July 1990 Form 340 Application, the proposed tower is used by several existing FM and television facilities. A December 1986 study entitled *Analysis of Electromagnetic Power Density Level in Vicinity of Joint Use Tower, Orlando, Florida*, performed by the consulting engineering firm of Jules Cohen and Associates, showed the cumulative power density at the base of this tower to be approximately eight (8) percent of the ANSI maximum. The situation has not changed since that study, a copy can be made available to the Commission staff upon request.

Clearly, the incremental field which would be produced by the proposed CFEFI facility will not cause the cumulative power density to exceed the 1 mW/sq cm ANSI limit at the tower base. The tower base is fenced and locked. The perimeter around the tower and transmitter buildings are fenced and a guard is posted. If it becomes necessary for workmen to be on the tower within 10 meters of the proposed antenna, CFEFI will cease radiating from the antenna.



James S. Hoge, President
Central Florida Educational Foundation, Inc.

CERTIFICATE OF SERVICE

I, Glinda M. Corbin, a secretary in the law offices of May & Dunne, Chartered, hereby certify that I have caused to be sent this 9th day of April, 1992 via first class U.S. mail, postage prepaid, a true and correct copy of the foregoing AMENDMENT TO APPLICATION OF CENTRAL FLORIDA EDUCATIONAL FOUNDATION, INC., to the following:

*The Honorable Edward Kuhlmann
Administrative Law Judge
Federal Communications Commission
2000 L Street, N.W., Room 220
Washington, D.C. 20554

*Larry D. Eads, Esq.
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Mass Media Bureau
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By: Glinda M. Corbin
Glinda M. Corbin

*Hand Deliver